

LECIA L. SHORTER
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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

LECIA L. SHORTER,

Plaintiff,

VS.

LERROY BACA, DEPUTY SHERIFF

ALEJANDRA AVALOS, DEPUTY SHERIFF

JAQUELINE ORTIZ, the COUNTY OF LOS

ANGELES and, Does 1 through 25, inclusive,

Defendants.

Case No.: CV 12-07337-DOC

**NOTICE OF MOTION AND MOTION OF
PLAINTIFF LECIA L. SHORTER
JUDGMENT NOTWITHSTANDING THE
VERDICT OR IN THE ALTERNATIVE,
JUDGMENT AS A MATTER OF LAW OR
FOR A NEW TRIAL**

DATE: April 24, 2023

TIME: 8:30 A.M.

PLACE: COURTOOM 10A
411 W. Fourth Street
Santa Ana, CA

Judge: David O. Carter

Trial date: March 7, 2023 – March 13, 2023

TO DEFENDANTS HEREIN AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 14, 2023, at 8:30 a.m. in Courtroom 10A, of the United States District Court, located at 411 W. Fourth Street, Santa Ana, CA, Plaintiff LECIA L. SHORTER will move this court to enter judgment notwithstanding the jury verdict

PLAINTIFF’S RULE 50 MOTION

1 because no reasonable jury could have reached the verdict as the jury in this instance. In the
2 alternative, since judgment has not yet been entered, Plaintiff moves for judgment as a matter of
3 law or for a new trial.

4 This motion is based upon Rule 50 of the Federal Rules of Civil Procedure because no
5 reasonable jury could have reached the verdict that the jury in this case just did. In other words,
6 the jury did not follow proper instructions and ruled for the opposing party based on legally
7 insufficient evidence or bias and prejudice.

8 This motion is based upon the evidence, oral or documentary, as is presented at the
9 hearing on said motion.

10
11 **MEET AND CONFER**

12 Because judgment has not been officially entered, Plaintiff has not conferred with
13 defense counsel regarding this motion.

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16 DATED: March 14, 2023

Lecia Shorter

17 LECIA L. SHORTER
18 Plaintiff In Pro Per
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PLAINTIFF'S RULE 50 MOTION

MEMORANDUM OF POINTS AND AUTHORTIES

If the court does not grant a motion for judgment as a matter of law made under Rule 50(a), the court is considered to have submitted the action to the jury subject to the court's later deciding the legal questions raised by the motion. No later than 28 days after the entry of judgment—or if the motion addresses a jury issue not decided by a verdict, no later than 28 days after the jury was discharged.

When Plaintiff filed her amended declaration regarding trial irregularities, juror misconduct, and inappropriate non-verbal communication between defense counsel and a juror, she was essentially making a Rule 50 motion for judgment as a matter of law and for a new trial.

Lecia Shorter

Dated: March 14, 2023

Lecia L. Shorter
Plaintiff In Pro Per

PLAINTIFF'S RULE 50 MOTION